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Attorneys for: Material Witness EPIFANIO BARAJAS-RODRIGUEZ

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ODILON CIRA-RAMIREZ,

Defendant.

UNITED STATES OF AMERICA,

Plaintiff,

v.

GERARDO SALTO-ROCHA (1),

JOSE HERNANDEZ-RIVAS (2),

Defendants

Criminal Case No. 08 cr 2429-WQH
Mag. Docket No. 08 mj 2098

**APPLICATION FOR AN ORDER
SHORTENING TIME TO HEAR
MATERIAL WITNESS EPIFANIO
BARAJAS-RODRIGUEZ'S MOTION FOR
VIDEO DEPOSITION AND RELEASE**

JUDGE: Hon. William McCurine, Jr.
CRTRM: "C", First floor

DATE: August 14, 2008
TIME: 9:30 a.m.

Criminal Case No. 08 cr 2430-BTM
Mag. Docket No. 08 mj 2098

EPIFANIO BARAJAS-RODRIGUEZ ("BARAJAS") hereby applies for an Order Shortening Time in which to hear his Motion for Video Deposition and Release. The Memorandum of Points and Authorities in support of the Motion, filed herewith, demonstrates

1 the hearing of the Motion on shortened time is necessary; specifically, that BARAJAS has been
2 incarcerated since July 8, 2008 and has no hope of obtaining a surety to post his bond.

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4 Dated: August 1, 2008

Mayfield & Associates

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6 By: /s/ Gayle Mayfield-Venieris
7 Gayle Mayfield-Venieris, Esq.
8 Attorney for Material Witness
9 EPIFANIO BARAJAS-RODRIGUEZ
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PROOF OF SERVICE VIA E-FILE
[Fed. R. Civ. Pro. 4, Local Rule 5]

UNITED STATES OF AMERICA,
Plaintiff,

v.

GERARDO SALTO-ROCHA (1),
JOSE HERNANDEZ-RIVAS (2),
Defendants

Criminal Case No. 08 cr 2430-BTM
Mag. Docket No. 08 mj 2098

I, Christopher Lock, declare as follows:

1. I am over eighteen years of age and not a party to the above-referenced action; my business address is 462 Stevens Avenue, Suite 303, Solana Beach, CA 92075-2066. I am employed in San Diego County, California.

1 of 2

2. On August 1, 2008, I filed the aforementioned document on the Court's CM/ECF system in Case No. 08 mj 2098/08 cr 2429-WQH/08 cr 2430-BTM. The following counsel were electronically served with the aforementioned document via the CM/ECF system pursuant to Local Rule 5.4(c):

- **Motion to Shorten Time**
- **Notice of Motion and Motion to take deposition by Video**
- **Points and Authorities in Support of Motion for Video Deposition**

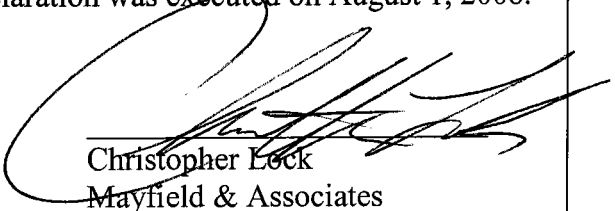
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I declare under penalty of perjury under the laws of the United States, State of California that the foregoing is true and correct and that this declaration was executed on August 1, 2008.


Christopher Lock
Mayfield & Associates

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